



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

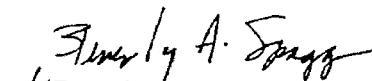
Ms. Kim A. Wolfe
Environmental Policy, Program and Permits
Savannah River Site
Aiken, South Carolina 29808

Dear Ms. Wolfe:

Thank you for your letter dated June 1, 2011, regarding an applicability determination request for the Savannah River Site (SRS), located in Aiken, South Carolina. The SRS is a U.S. Department of Energy owned and contractor operated facility which operates several stationary and portable diesel generators, air compressors, and firewater pumps as emergency units. These emergency units are subject to the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE) requirements in 40 CFR 63, Subpart ZZZZ, which requires the owner or operator to record the hours of operation of each engine using a non-resettable hour meter. The larger emergency units are typically configured with the hour meter hardwired to the engine and located on a control panel. However, the preamble to the RICE rule seems to indicate that the hour meter must be installed on the engines. Therefore, the SRS is requesting an applicability determination as to the use of non-resettable hour meters hardwired to existing emergency generating units to record hours of operation in situations where the hour meters are not physically located "on" the existing emergency engine.

We have consulted with the U.S. Environmental Protection Agency's Office of Air Quality Planning and Standards and conclude that it is acceptable for the non-resettable hour meter to be hardwired to the engine and located on the control panel, as described in your letter, rather than physically located on the engine. If further assistance is needed, please contact Lee Page of the Region 4 staff at (404) 562-9131.

Sincerely,


Beverly H. Banister
Director
Air, Pesticides and Toxics
Management Division

cc: Mr. Heinz Kaiser
Manager, Air Toxics Section in the Bureau
of Air Quality, SCDHEC



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MAR 13 2012

Ms. Valerie Gipson
Citrus World, Inc.
D/b/a Florida's Natural Growers
P. O. Box 1111
Lake Wales, Florida 33859-1111

Dear Ms. Gipson:

This is in response to your letter dated February 21, 2012, regarding applicability of the Reciprocating Internal Combustion Engine (RICE) regulation in 40 CFR Part 63, Subpart ZZZZ to various engines located at the Citrus World, Inc. facility in Lake Wales, Florida. More specifically, you have requested an applicability determination for the following engines:

1. Portable pumps that are either portable by nature (size/design) or built on a skid, that are moved throughout the facility to assist where other equipment has failed or additional capacity is needed on a temporary basis.
2. Pressure washers/air compressors that are smaller units designed for portability and are used throughout the facility for small maintenance and repair needs.
3. Welders/back-up generators that are moved throughout the facility to be used when needed due to other equipment failures.

Generally, the engines you mention above will be classified as non-road engines. However, a regulatory authority implementing and enforcing Subpart ZZZZ should have more specific information on the engines before a final case-by-case determination can be made. For example, how often are the engines moved, and what distances are they moved? Although an engine may be portable by nature or built on a skid, if it is only moved a short distance on a very infrequent basis, such as once a year, then the engine could be viewed as more stationary than portable.

Such specific information should be discussed with the Florida Department of Environmental Protection so a final applicability determination can be made. Our office is available to assist the Florida Department of Environmental Protection with their determination, should it be desired.

If further assistance is needed, please contact Lee Page of the Region 4 staff at (404) 562-9131.

Sincerely,

A handwritten signature in black ink that reads "Carol H. Banister".

Beverly H. Banister
Director
Air, Pesticides and Toxics
Management Division

cc: Jeff Koerner, FDEP

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